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April 19, 2000

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RECEIVED

APR 24 2000

FCC MAIL ROOM

Eloise Gore, Esq.
Cable Services Bureau
Federal Communications Commission
445 Twelfth Street, NW, Fourth Floor
Washington, D.C. 20554

Re: Sports Telecast Schedules, CS Dkt. No. 00-2

Dear Eloise:

At the recent meeting between the Cable Services staff and counsel for the National Football League, you expressed an interest in seeing how the telecasting schedule of the NFL differs from those of other professional and collegiate sports organizations. The request arose in the context of our representation that the NFL's television plan – in which rights are sold nationally, but virtually all games are distributed regionally – is far and away the one most threatened by satellite carriage of distant network signals. The concern of course is that, since network stations will be available local-into-local, they will be available on the satellite for distant carriage, as well.

I believe that the following is an accurate representation of nationally negotiated regular and post-season telecasts of the various leagues and conferences:

National Football League

Every NFL game is shown on conventional over-the-air television, with the vast majority shown regionally in the United States. The League sells four television packages:

CBS and **Fox** show all regular season Sunday afternoon away games of American Conference and National Conference teams, respectively. The networks generally

■ WASHINGTON, DC ■ HOUSTON ■ AUSTIN
■ HONOLULU ■ LAS VEGAS ■ MCLEAN ■ MIAMI

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alternate double-header coverage, with CBS affiliates getting the double-header one week and Fox the next. In the home territory of an NFL club, when the local team is playing at home, the local market (e.g., Washington) will see two games; when the local team is away, the local market will see three games. For markets where there is no NFL team (e.g., Tulsa), three games are offered every week. Every single game played – as many as 13 games on a Sunday afternoon – is shown on a regionalized basis on the two networks during the six-hour window from 1:00 PM-7:00 PM (ET) every Sunday. (Even so-called “national” telecasts on Sunday are in fact regional, as several games are shown simultaneously in different television markets. The game designated as the “national” game is simply aired in by far the most markets. To illustrate this point, I am enclosing maps showing American and National Conference distribution on CBS and Fox respectively for a typical Sunday afternoon during the 1999 regular season; these will give you a perspective on “national” and regional telecasts.)

ESPN offers the single Sunday night game each week on cable and satellite. Although distributed nationally on cable and satellite on ESPN, this game is simultaneously distributed on broadcast television in the home cities of the participating teams, subject to the League’s blackout rule.

ABC offers the single Monday Night Football game each week. It is shown nationwide, including in the home cities of the participating teams, subject to the League’s blackout rule.

In the post-season, **ABC** carries the two Saturday wildcard games in the first week of the playoffs. For the rest of the post-season (until the Super Bowl), **CBS** and **Fox** carry the games of their respective conferences. Carriage of the Super Bowl is contractually divided among **ABC**, **CBS**, and **Fox**.

Major League Baseball

Fox (now in the last year of its contract) carries Major League Baseball telecasts during the regular season as Game of the Week telecasts. During the 2000 season, on 17 Saturdays, Fox will televise regionally a total of 61 games (2.5% of the Major League schedule). Those games will be available on Fox affiliates in various regions of the country. In addition, Fox will carry the National League Championship Series and the World Series in 2000.

NBC (also in the last year of its contract) will air the All Star Game and the American League Championship Series.

(In addition, **ESPN** (in the first year of a six year contract) and **FX/Fox Sports Net** (in the

last year of their contracts) will distribute games over cable and satellite.)

National Basketball Association

NBC carries NBA games during 33 “windows” on 18 different dates during the regular season. During the 33 windows, there will be 20 in which 44 games will be broadcast regionally (3.7% of the NBA schedule); the other 13 windows will offer a single national telecast. These 44 games will be available on NBC affiliates in various regions of the country. In addition, NBC will carry a number of the First Round, Conference Semi-Final, and Conference Final games and will carry all of the NBA Finals. No regional post-season telecasts will be offered; all games shown will be shown nationally.

(Both **TBS** and **TNT** have contracts to air games during the regular and post-season on cable and satellite.)

National Hockey League

ABC carries NHL games during four “windows” on four different dates during the regular season. During the four windows there will be 16 games broadcast regionally (1.4% of the NHL schedule). These 16 games will be available on ABC affiliates in various regions of the country. In addition, ABC will televise regionally three or four games on four dates in the first two rounds of post-season play and will carry a number of other games nationally in the Conference Finals and Stanley Cup Finals.

(Both **ESPN** and **ESPN2** have contracts to air games during the regular and post-season on cable and satellite.)

College Sports

Since the 1984 decision in National Collegiate Athletic Association v. Board of Regents, the NCAA has not been involved in college football telecasting. To that end, there is no regional distribution of any nationally negotiated football contract (in contrast to the NFL, for example); nor is there any subregional distribution of any regionally negotiated football contract (with the Atlantic Coast Conference in the eastern part of the United States, for example).

The NCAA, however, does control and sell the rights to its National Basketball Championship (“March Madness”); the current rights holder is **CBS**. On the first Thursday and Friday of the tournament, CBS shows 16 games regionally on each day; on the first Saturday and Sunday of the tournament, it shows eight games regionally on each day; and on the second Thursday and Friday of the tournament, it shows four games regionally on each day. (Thereafter, all the remaining games are shown nationally.) Other than “March Madness,” there is no regional distribution of nationally negotiated collegiate basketball contracts. It is not uncommon,

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however, for there to be subregional distribution of regionally negotiated conference basketball contracts.

* * * *

Also, pursuant to your request, I am providing information on League broadcasting policies for switching out of non-competitive games.

Please let me know if you have any questions.

Sincerely,


Philip R. Hochberg

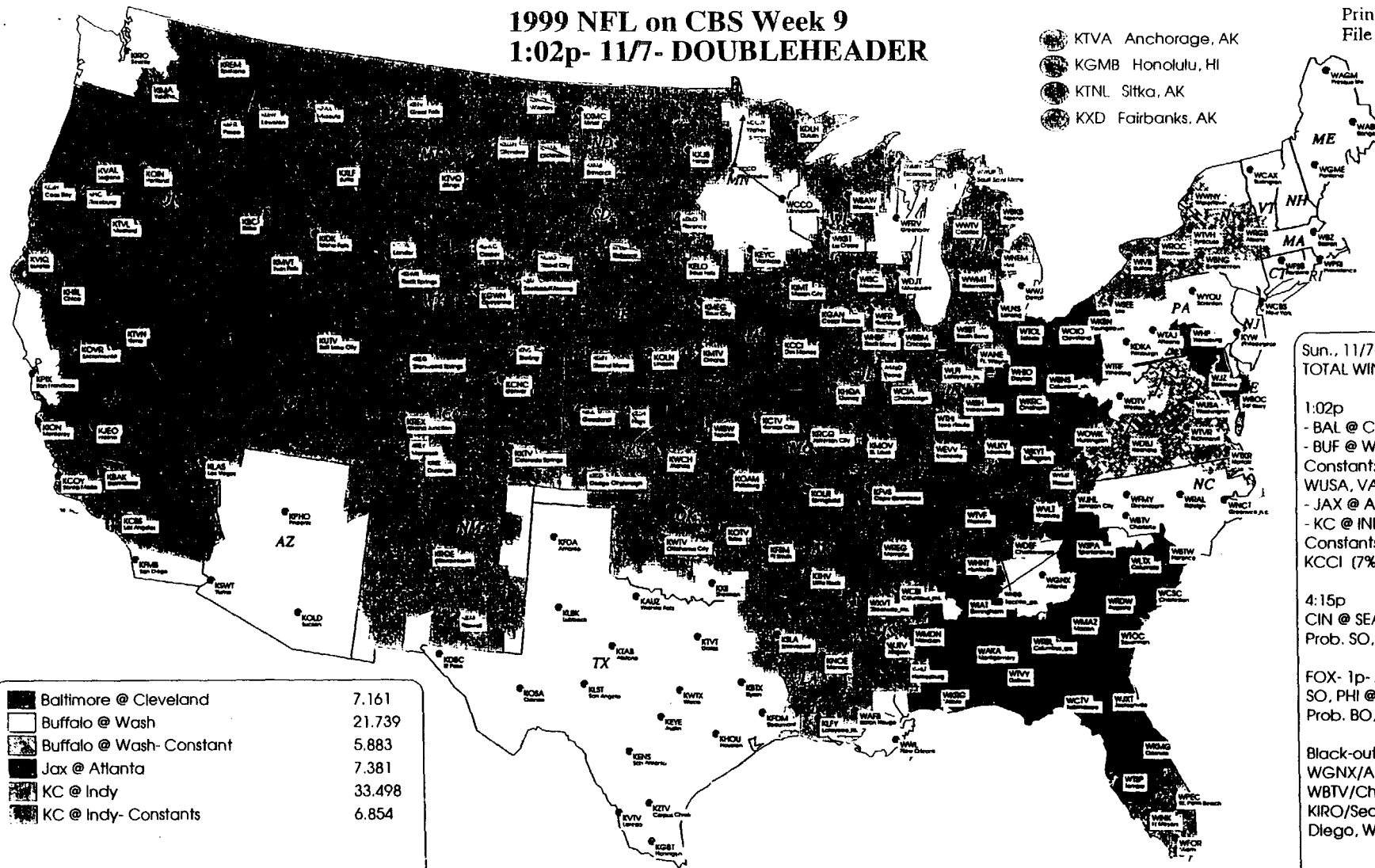
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cc: Ms. Magalie Roman Salas, Secretary, Federal Communications Commission (2 copies) ✓
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1999 NFL on CBS Week 9 1:02p- 11/7- DOUBLEHEADER

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File Name: 117a_6day.map

- KTVA Anchorage, AK
- KGMB Honolulu, HI
- KTNL Sitka, AK
- KXD Fairbanks, AK



Baltimore @ Cleveland	7.161
Buffalo @ Wash	21.739
Buffalo @ Wash- Constant	5.883
Jax @ Atlanta	7.381
KC @ Indy	33.498
KC @ Indy- Constants	6.854

Sun., 11/7- Week #9- DH
TOTAL WINDOW: 82%

1:02p
- BAL @ CLE- SO- 7%
- BUF @ WAS- SO- 28%
Constant: WSEE, NY ex. WCBS,
WUSA, VA- (6%)
- JAX @ ATL- Prob. BO- 7%
- KC @ IND- SO- 40%
Constants: KS, MO, NE, IN, KHQA,
KCCI (7%)

4:15p
CIN @ SEA- Prob. SO, DEN @ SD-
Prob. SO, PIT @ SF- SO

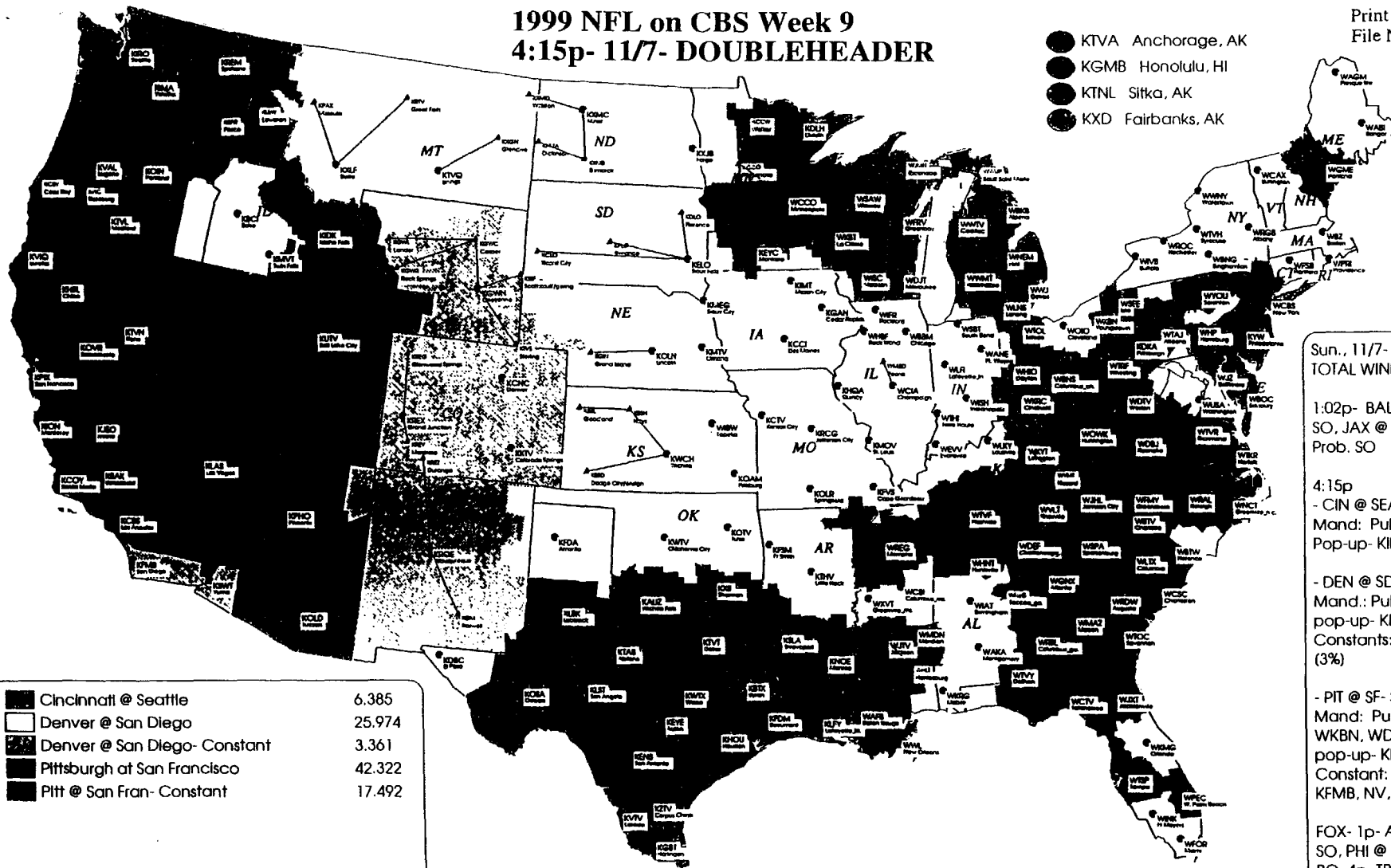
FOX- 1p- AZ @ NYJ- SO, CHI @ GB-
SO, PHI @ CAR- Prob. SO, STL @ DET-
Prob. BO, 4p- TB @ NO- Prob. BO

Black-outs: WWJ/Detroit,
WGNX/Atlanta, WCBS/NY,
WBTV/Charlotte, WWL/New Orleans,
KIRO/Seattle, KPIX/San Fran, KFB/San
Diego, WFRV/Green Bay- 18%

1999 NFL on CBS Week 9 4:15p- 11/7- DOUBLEHEADER

Print Date: 11/01/99 10:31:28
File Name: 117b_6day.map

- KTVA Anchorage, AK
- KGMB Honolulu, HI
- KTNL Sitka, AK
- KXD Fairbanks, AK



■ Cincinnati @ Seattle	6.385
□ Denver @ San Diego	25.974
■ Denver @ San Diego- Constant	3.361
■ Pittsburgh at San Francisco	42.322
■ Pitt @ San Fran- Constant	17.492

Sun., 11/7- Week #9- DH
TOTAL WINDOW: 94%

1:02p- BAL @ CLE- SO, BUF @ WAS-
SO, JAX @ ATL- Prob. BO, KC @ IND-
Prob. SO

4:15p
- CIN @ SEA- Prob. SO- 6%
Mand: Pull outs- WKRC, WHIO, WKYT,
Pop-up- KIRO

- DEN @ SD- Prob. SO- 29%
Mand.: Pull outs- CO (ex. KREZ),
pop-up- KFMB
Constants: CO, NM, WY, KFMB, KSWT
(3%)

- PIT @ SF- SO- 59%
Mand: Pull-outs- KDKA, WTAJ,
WKBN, WDTV, WTRF, KOVR, KION,
pop-up- KPIX
Constant: WDTV, WTRF, PA, CA e.
KFMB, NV, UT (17%)

FOX- 1p- AZ @ NYJ- SO, CHI @ GB-
SO, PHI @ CAR- SO, STL @ DET- Prob.
BO, 4p- TB @ NO- Prob. BO

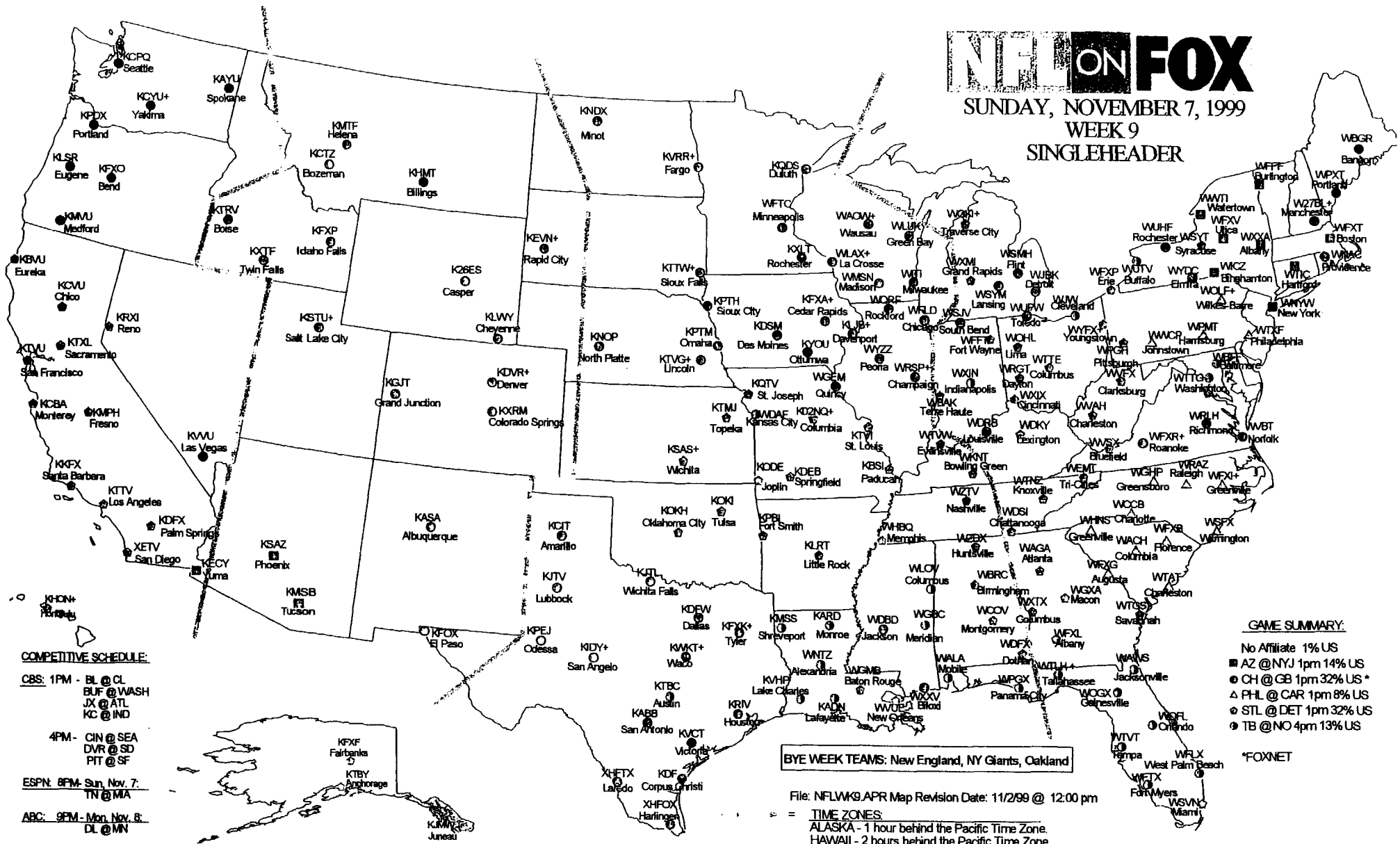
Black outs: WOIO/Clev,
WUSA/Wash, WISH/Indy- 5%

NFL ON FOX

SUNDAY, NOVEMBER 7, 1999

WEEK 9

SINGLEHEADER



CHANGES TO LEAGUE BROADCASTING POLICIES

The following changes have been adopted for the 1999 NFL season:

Pre-game, Bridge and Postgame Shows

- For the bridge show between games, there will be no limitation on the number and length of live game cut-ins.
- For the late game only markets, there will be no limitation on the number and length of live game cut-ins from 4pm to Kickoff of the late game.
- For the early game only markets, there will be no limitations on the number and length of live game cut-ins from the end of the early game to 4:15pm ET. After 4:15, live game cut-ins will not be allowed.

For the single game network on Sunday afternoon, we will allow an unlimited number and duration of cut-ins from the end of the game telecast to 4:15pm ET and then no cut-ins allowed thereafter.

As for postgame shows after 7:00pm ET, our current rules will remain the same. The doubleheader network will continue to be allowed to "normal" the network by sending an audience from the conclusion of one game to another game still in progress. For the single game network, they are not able to "normal" the network, but can air a postgame show with no live game cut-ins.

Sunday Afternoon Game Distribution Policies

The previous policy regarding switching audiences from a non-competitive game prior to its finish to a more compelling game requires CBS and Fox to wait until the commencement of the third quarter and a scoring margin of 18 or more points. In addition, a Network that switches an audience may not switch away any of the original game home markets areas (blackout area) and may not switch back to the original game.

Changes to this policy include:

- Allowing CBS and Fox to consult with a designated NFL Broadcasting representative on situations in which certain secondary markets (e.g. Orlando, FL and Harrisburg, PA) should be switched away from a non-competitive game.
- Allowing CBS and Fox to switch back to the original game it was broadcasting after an audience switch, if the original game suddenly becomes competitive.